

**RONALD J. COHEN, P.A.**

ATTORNEYS AND COUNSELORS AT LAW

*Handwritten*  
FEB - 3 2011

2-4-11

C.J.

January 27, 2011

Via FedEx (7967 0121 4117) to:

Honorable Harvey Bartle, III, Chief Judge  
U.S. District Court, Eastern District of Pennsylvania  
601 Market Street,  
Room # 16614  
Philadelphia, PA 19106-1710

**FILED**

*McMILLIAN RUEZ Clark  
By [Signature]*

*Set copy of  
letter to defendant  
on 1/28/11*

Re: Case Numbers 2:09-cv-03240, 2:09-cv-03241, 2:09-cv-03243, 2:09-cv-03244, and  
2:09-cv-03247

Dear Judge Bartle:

I trust this letter finds you well. I am requesting a 45-day extension of time to file expert's reports and dispositive pretrial motions.<sup>1</sup> The Court's First Scheduling Order, a copy of which is enclosed, directed expert witness' reports to be filed by February 28, 2011; responsive reports by March 31, 2011; expert discovery completed by April 15, 2011; and all dispositive motions filed by April 30, 2011. On my clients' behalf I request that only the following deadlines be prolonged, as follows:

- \* fact discovery to be completed by May 13, 2011;
- \* expert witness' reports to be filed by April 15, 2011;
- \* responsive reports by May 13, 2011;
- \* expert discovery completed by May 31, 2011; and
- \* all dispositive motions filed by June 17, 2011.

The cases at bar involve claims for violation of norms of international law lodged by plaintiffs from the Republic of Moldova against a now-imprisoned defendant. Defendant did not appear to defend the instant suit.

The requested extension is tied to the difficulty of cross-border discovery, specifically, retention of a forensic psychiatrist in the Republic of Moldova. Unlike in the United States, the area of forensic psychiatry in Moldova is governed by the state's Ministry of Health. Due to peculiarities of the Moldovan system, obtaining forensic examinations in connection with matters not pending before a Moldovan tribunal has proven impossible and caused the instant delay.

<sup>1</sup> According to the policies and procedures posted on <http://www.paqd.uscourts.gov/documents/procedures/barpol.pdf>, "Counsel may write to Judge Bartle to request an extension of time and for all matters pertaining to scheduling."

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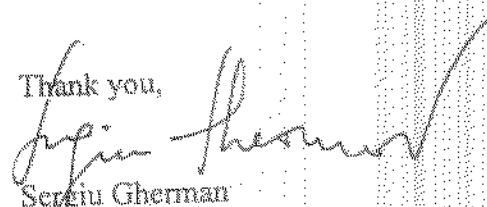
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Neither the neighboring Ukrainian nor Romanian systems look helpful at this time. Bringing plaintiffs to the United States for evaluation implicates the time needed for U.S. Consulate to issue visas and also requires time for travel arrangements.

Should Your Honor grant the instant request, a form order, is enclosed.

Thank you,

  
Sergiu Gherman

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